

Claim Number I

During July, 2013, The Virginia State Department of Corrections (VADOC) announced that JPay, Inc. (JPay), 12864 Biscayne Blvd, Suite 243, Miami, FL 33181 would be selling MP3's, books and music to the offender population in numerous VADOC facilities via a KIOSK system. Because of my age, I am having a hard time memorizing Bible versus and knew it would help me. I also wanted the audio version of The Holy Bible so that I could read along with the spoken Word and use it to assist in my Bible studies. I had looked into purchasing the Bible on CD's but the number of CD's required was way above our allowed limit. I had seen in a catalogue from CHRISTIANBOOK.COM that I could buy a preloaded MP3 with The Holy Bible for between \$49.99 and \$150.00 based on options selected.

On August 3, 2013, I wrote to a Ms. Wendy Hobbs (Attachment number 1), VADOC, and Richmond, Va. Ms. Hobbs had been selected by Mr. Harold W. Clarke, Director VADOC, to be in charge of the installation of the JPay, Inc.'s KIOSK systems that were being installed at VADOC facilities for access to the music, books, e-mail, and video systems that JPay was going to offer to the offender population.

On August 21, 2013, Mr. Louis B. Cei, PhD, Director Support Manager, VADOC responded to my letter to Ms. Hobbs regarding The Holy Bible on MP3's (Attachment Number 2). I was surprised that Mr. Cei was positive to my letter and thanked me for the sources I had provided Ms. Hobbs for MP3's with the preloaded Holy Bible.

During April and the first half of May, 2014, the JPay KIOSK stations were installed at Coffeewood Correctional Center (CWCC). On or about 5 May, 2014, I requested and received a userid (my offender number) and password to access the JPay KIOSK system. From my first logon into the KIOSK, I have searched for The Holy

Bible. Some of the different searches were Holy Bible, Version and other possible variations. To my surprise, I found the Bible by searching for The Book of Numbers. I found what appeared to be the whole Bible under an album named King James Bible and the artist was identified as a Christopher Marshall. I was perplexed because every book or chapter had a red X where the add to basket button option should have been located. I just figured that I had to find the download point for the King James Bible album and I would be able to buy The Holy Bible from that point. I just figured it was like what some other offenders had run into on some of the records they had tried to purchase where the button to add the record to your basket was to your basket button was red x'd out and you had to buy the whole album in order to purchase that given item.

On or about June 24, 2014, I decided to move \$65.00 from my inmate trust account to JPay to buy the MP3. I was sure I would find an affordable Holy Bible on the JPay system. Well, the next morning I suffered a bout of buyer's remorse and tried to find to cancel the transaction. I discovered that JPay did not offer an option to cancel a transaction once submitted. This surprised me because I thought I would have some means to change my mind. I thought about this for awhile and realized that the CWCC business office would have to process a withdrawal from my inmate trust account to JPay. I immediately sent a request to the business office and they were successful in stopping the transaction.

On June 26, 2014, I sent a trouble ticket to JPay asking who on CWCC or in VADOC was responsible for addressing issues dealing with JPay. They responded with the JPay's address and advised me to write to them at 12864 Biscayne Blvd, Suite 243, Miami, FL 33181. No address for VADOC was provided.

On July 1, 2014 I sent a request to the CWCC business office asking who within VADOC was responsible for addressing issues with JPay. A Ms. Mabray responded on July 2, 2014 (Attachment Number 3) advising I was to address this issue to JPay with a work ticket through the KIOSK. Back to square one.

I continued my search for The Holy Bible and putting in trouble tickets to JPay asking about The Holy Bible. Finally, on July 5, 2014 I made up my mind that the only way that maybe I could get something positive from JPay is if I actually purchased an MP3/JP4 (as JPay sells them). On July 6, 2014, I moved \$50.00 from my CWCC inmate trust account to JPay and on July 7, 2014 I placed my order to buy the JP4 unit from JPay. I guess they wanted to make sure I could not change my mind and the same day processed my order with the CWCC business office.

While continuing my search, I was surprised and shocked to find numerous versions of The Holy Quran, El-Quran, El Quran Completo, and Al-Quran Al-Karim (Attachment Number 4)(Claim 1). The cost of these different versions varied from \$15.83 to over \$600.00. Yet, I was not able to find a single version of The Holy Bible and for that fact to my knowledge no other religious principal books were offered.

On July 9, 2010 I realized that maybe something was in the terms of service that I accepted on my initial entry into the KIOSK that would be of help. I asked and received from JPay a copy of the terms of service that I had agreed to on my initial login to the JPay system. According to the terms of service it appears that almost nothing is the fault of JPay. They said that CWCC was responsible for the content, length and times of sessions and just about everything else and they were not at fault for much.

I have spent almost every day looking for The Holy Bible on the system. I kept asking JPay as to when The Bible would be available. I have been told to be patient, The Bible will never be on the system, it takes too much space, you will have to buy it by the book, etc. Again to my surprise, during the week of September 8, 2014 I found 89 Bibles in a wide combination of versions and languages. In each case only 100 chapters were available. I was even more surprised when I found out that JPay had obtained the Bibles from Bible.IS. My understanding is that Bible.IS is an internet provider of Audio, visual and other Bible aides at zero cost. The Bible versions are not only available from their web site, Bible.IS but also iTunes.com. All for free.

I asked JPay if I bought one of the incomplete Bible albums would I be able to download the complete Bible once it was available. JPay's response was that it was up to the buyer to be sure that all was there and they would not allow for the download of the complete Bible at a later date without additional payment. At this point I decided I had enough of the run around from JPay.

I don't understand JPay's support of the Quran and none for The Holy Bible. I also don't understand how they can offer albums that are not complete and say it is our fault if we buy what they offer as complete (an album)(Claim 2) and it is not. In one case they offer The New Testament and Classical Psalms for over \$300.00. There should have close to 400 chapters in this album but in fact there were about 100 chapters.

On top of the fight with JPay over not having The Holy Bible I have no authority within VADOC to take the issue too (Attachment Number 3) (Claim 3) even though I am at a VADOC facility.

Claim Number 2

JPay has continually advertised that they had the complete albums for The Holy Bible, The New Testament of The Holy Bible and The Old Testament of The Holy Bible while they actually offered about 100 chapters of each volume.

Claim Number 3

Virginia Department of Corrections has created a de facto sub-agency with JPay, Inc. because JPay is not responsible to any person or entity on Coffeewood Correctional Center. Since no one on Coffeewood Correctional Center has any authority to take any complaint there is no way to address any problem with JPay other than with JPay themselves.